

LAW OFFICES OF  
**WALKUP, MELODIA, KELLY, WECHT & SCHOENBERGER**  
A PROFESSIONAL CORPORATION

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DOUGLAS S. SAELTZER (State Bar #173088)  
ATTORNEYS FOR PLAINTIFFS

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CARLA CORTES, a minor, by and through her  
Guardian ad Litem, ISABEL CORTES  
GARCIA; ISABEL CORTES GARCIA; and  
JUAN CARLOS GARCIA TORRES

Plaintiffs,

v.

DAIMLER CHRYSLER CORPORATION, and  
DOES ONE through ONE HUNDRED,

Defendants.

Case No. 05-01012 CRB (JL)

**STIPULATION AND [PROPOSED]  
ORDER SHORTENING TIME FOR  
PLAINTIFFS' MOTION TO COMPEL  
DEPOSITION OF DEFENDANT'S  
CORPORATE REPRESENTATIVE**

The parties, by and through their attorneys of record, hereby submit the following  
Stipulation to shorten the time for plaintiffs' to file their motion to compel the deposition of  
defendant's corporate representative.

**REASON FOR REQUEST**

Despite attempts of counsel to complete the required depositions within the existing  
discovery deadline, they have encountered a severe scheduling/calendaring problem with one of  
defendant's corporate representatives. For several months the parties have believed that this  
deposition would be calendared. However, to date this has not occurred. This stipulation is made  
in recognition that without it the motion, and discovery at issue, would not occur before the  
deadline for nonexpert discovery.

**PREVIOUS TIME MODIFICATIONS**

The parties stipulated to, and the Court ordered, a continuation of the mediation deadline from December 16, 2005 to January 6, 2006. The parties stipulated to, and the court ordered, a continuation of the mediation deadline from January 6, 2006 to March 30, 2006. The parties also twice stipulated to, and the court ordered, a continuation of the close of nonexpert discovery from August 11, 2006 to September 30, 2006, and from September 30, 2006 to November 6, 2006.

**EFFECT OF PROPOSED TIME MODIFICATION ON CASE SCHEDULE**

The parties do not foresee negative effects on the case schedule resulting from this stipulation. In fact, the purpose of this motion is to complete discovery within the existing deadline.

**STIPULATION**

The parties stipulate and request that the Court shorten the time for plaintiffs' motion to compel the deposition of defendant's corporate representative as follows:

October 27, 2006 – Defendant's opposition due

October 30, 2006 – Plaintiffs' reply brief

November 1, 2006 – Hearing date.

**IT IS SO STIPULATED.**

Respectfully submitted,

DATED: October 18, 2006

SEDGWICK, DETERT, MORAN & ARNOLD

/s/ Micki S. Singer  
By: \_\_\_\_\_  
MICKI S. SINGER  
SEDGWICK, DETERT, MORAN & ARNOLD  
Attorneys for Defendant  
DAIMLER CHRYSLER CORPORATION

1 DATED: October 18, 2006

WALKUP, MELODIA, KELLY, WECHT &  
SCHOENBERGER

/s/ Douglas S. Saeltzer

By:

DOUGLAS S. SAELTZER  
WALKUP, MELODIA, KELLY, WECHT &  
SCHOENBERGER  
Attorneys for Plaintiffs CARLA CORTES, a  
minor, by and through her Guardian at Litem,  
ISABEL CORTES GARCIA; ISABEL CORTES  
GARCIA; and JUAN CARLOS GARCIA  
TORRES

8 I, Douglas S. Saeltzer, am the ECF User whose ID and password are being used to file this  
9 Stipulation and [Proposed] Order Re Continuation of Non-Expert Discovery Deadline. In  
10 compliance with General Order 45, X(B), I hereby attest that Micki S. Singer has concurred in this  
11 filing.

By: Douglas S. Saeltzer  
DOUGLAS S. SAELTZER

[PROPOSED ORDER ON FOLLOWING PAGE]

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**[PROPOSED] ORDER**

Pursuant to the Stipulation above, the time for plaintiffs' motion to compel the deposition of defendant's corporate representative is shortened as follows:

October 27, 2006 – Defendant's opposition due

October 30, 2006 – Plaintiffs' reply brief

November 1, 2006 – Hearing date.

**IT IS SO ORDERED.**

DATED: October 20, 2006



THE HONORABLE JAMES LARSON  
UNITED STATES MAGISTRATE JUDGE